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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

**IN RE WATTSTOCK, LLC,**

*Debtor.*

**WATTSTOCK LLC,**

*Plaintiff,*

**v.**

**ALTA POWER LLC,**

*Defendant, Counter-Plaintiff, and Third-Party Plaintiff,*

**v.**

**WATTSTOCK LLC,**

*Counter-Defendant, and*

**GENERAL ELECTRIC  
INTERNATIONAL, INC., d/b/a GE  
POWER SERVICES,**

*Third-Party Defendant.*

**Case No. 21-31488-sgj11V**

**Chapter 11  
Subchapter V**

**Adv. No. 21-03083-sgj**

*Removed from the District Court of  
Dallas County, Texas, 116<sup>th</sup> Judicial  
District*

**Case No. DC-20-08331**

**GENERAL ELECTRIC INTERNATIONAL, INC.'S MOTION  
TO AMEND THE SCHEDULING ORDER AND TEMPORARILY STAY DISCOVERY**

Third-Party Defendant General Electric International, Inc. (“GE”) hereby respectfully moves the Court to amend the scheduling order, consistent with Federal Rule of Civil Procedure 16(b), to set a deadline for the pleadings to close. Specifically, GE requests that the Court order:

- (1) Any motion for leave by WattStock to amend its complaint against Alta to be filed no later than 30 days from the date of the Court’s order;
- (2) Any amended answer and counterclaims by Alta against WattStock, and any motion for leave by Alta to amend its third-party complaint against GE, to be filed within 21 days of the later of WattStock’s deadline to file a motion for leave or the docketing of any amended complaint by WattStock;
- (3) Any amended answer by WattStock, and any amended answer and counterclaims by GE, to be filed within 21 days of the later of Alta’s deadline to file a motion for leave or the docketing of any counterclaims and/or amended third-party complaint by Alta;
- (4) Any answer by Alta to any GE counterclaim to be filed within 14 days of GE’s amended answer; and
- (5) The pleading to close 14 days after WattStock’s deadline to file its amended answer and GE’s deadline to file its amended answer and counterclaims.

GE further requests that the Court stay all proceedings and discovery in this case until the pleadings are closed and a new scheduling order is entered by the Court. The grounds for this motion are fully set forth in the accompanying brief, filed concurrently.

Dated: November 23, 2022

Respectfully submitted,

/s/ Andrew LeGrand  
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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document has been served on counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Andrew LeGrand

Andrew LeGrand

*Attorney for General Electric  
International, Inc.*

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Bankruptcy Rule 7007-1, I certify that on November 18, 2022, counsel for GE met and conferred with counsel for Alta Power LLC. Alta and GE were unable to reach agreement and have reached an impasse, leaving the open issues for the court to resolve. The motion is opposed by Alta Power LLC. I certify that on November 21, 2022, counsel for GE met and conferred with counsel for WattStock LLC. WattStock LLC does not oppose this motion.

/s/ Andrew LeGrand

Andrew LeGrand

*Attorney for General Electric  
International, Inc.*